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*Attorneys for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ALEX ANG and LYNN STREIT,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

BIMBO BAKERIES USA, INC.,

Defendant.

Case No. 13 Civ. 1196 (HSG)

**DECLARATION OF ALEX ANG IN  
SUPPORT OF PLAINTIFFS' OPPOSITION  
TO DEFENDANT'S MOTION FOR  
SANCTIONS**

Judge: Hon. Haywood S. Gilliam, Jr.

Action Filed: March 18, 2013

Motion Hearing Date: August 20, 2015

1 ALEX ANG hereby declares, pursuant to 28 U.S.C. § 1746, as follows:

2 1. I am a plaintiff in the above-entitled action. I make this declaration in support of  
3 plaintiffs' opposition to defendant's motion for spoliation sanctions. I have personal knowledge  
4 of the facts stated herein, and if called as a witness, could and would testify competently to the  
5 truth thereof.

6 2. I first met my attorney Pierce Gore on March 13, 2013. We discussed the duties  
7 of a class representative. We specifically discussed my grocery shopping, and my purchases of  
8 defendant's products. I decided to retain Mr. Gore as my attorney, and serve as a class  
9 representative in litigation against defendant.

10 3. I brought to my meeting with Mr. Gore packages of defendant's products that I  
11 had purchased during the prior month. At that time, I no longer had any receipts for my  
12 purchases of those products.

13 4. I discussed with Mr. Gore the need to save receipts from future grocery  
14 purchases. However, I misunderstood Mr. Gore's direction and thought that I only had to save  
15 receipts for any future purchases of defendant's products.

16 5. No one has never asked or instructed me to discard or destroy any receipts for  
17 grocery purchases that I personally made.

18 6. In response to document requests from defendant, at Mr. Gore's request, I gave  
19 him all the food receipts that I had in my possession at the time my attorneys were responding  
20 to those requests. At my deposition, defendant's counsel asked me questions about my  
21 packages and grocery receipts.

22 7. I have not purchased any of defendant's products since the day I first met with  
23 Mr. Gore.

24 8. To my knowledge, I also have not purchased any products from any  
25 manufacturer: with the American Heart Association Heart-Check Mark on the label; with the  
26 phrase "good source of whole grain" or "excellent source of whole grain" on the label; with the  
27 word "bread" on that label that also contains added coloring; or with the phrase "100% whole  
28 wheat" that also contains non-whole wheat flour.

11. Since I moved in with my girlfriend, she does most of our grocery shopping. I have done a limited amount of grocery shopping since my deposition. Since my deposition, I have saved my receipts, and provided them to Mr. Gore on June 26, 2015.

Executed this 26 day of June, 2015.

Alex Ang